

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

RICHARD WAYNE HICKS,	)	
	)	
Plaintiff	)	
	)	Case No. CIV-17-296-SLP
v.	)	
	)	
CITY OF FAIRVIEW, OKLAHOMA, and	)	
CHARLES GADD,	)	
	)	
Defendants.	)	

**DEFENDANT CITY OF FAIRVIEW, OKLAHOMA’S  
OBJECTIONS TO PLAINTIFF’S EXHIBITS**

Pursuant to the Court’s Scheduling Order [Dkt. 31], Defendant City of Fairview, Oklahoma hereby submits the following objections to Plaintiff’s Final Exhibit List.

No.	Exhibit	Objection
1.	Medical Records of Plaintiff	Identification; Relevance; Prejudicial; Confusing; Misleading; Hearsay; Authentication FRE 401-403; 801 <i>et seq.</i> ; 901
2.	Video of Incident	
3.	Incident Reports	Identification; Relevance; Prejudicial; Confusing; Misleading; Hearsay; Authentication FRE 401-403; 801 <i>et seq.</i> ; 901
4.	Probable Cause Affidavit	Identification; Relevance; Prejudicial; Confusing; Misleading; Hearsay; Authentication FRE 401-403; 801 <i>et seq.</i> ; 901
5.	Tulsa Public Schools P.D. investigations related to Gadd’s previous use of force while in their employment	Identification; Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
6.	Fairview Policy & Procedure	

7.	<i>Fairview Police Chief Under Investigation</i> , The Oklahoman, September 29, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
8.	<i>Fairview Police Officer Charged with Child Porn</i> , <a href="http://enidnews.com">enidnews.com</a> , September 23, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
9.	<i>Embattled Ex-Police Chief Under Fire Once Again</i> , <a href="http://news9.com">news9.com</a> , September 21, 2017	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
10.	<i>New Chief: Fairview Hires Retired OHP Trooper</i> , <a href="http://enidnews.com">enidnews.com</a> , January 6, 2016	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
11.	OSBI Report and attached documents	Identification; Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
12.	Letter from Catherine Streater to Special Agent Ridgeway – Dec. 23, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
13.	JHB Wilson’s Affidavit of Lost Document and “Exhibit A – Final Order of Suspension” – Dec. 23, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
14.	Letter from Officer J. Reichert to Catherine Streater – Dec. 4, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
15.	CLEET Field Representative Agency Visitation Form, Date of Contact – November 20, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
16.	Cover letter to Notice of Intent to Suspend sent by Catherine Streater – February 3, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901

17.	CLEET Notice of Intent to Suspend re Gadd, Case No. 22963-15 – Filed February 3, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
18.	CLEET Final Order of Suspension re Gadd, Case No. 22963 – Filed June 11, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901
19.	Email from Catherine Streater to Christopher Boring and Steven Randolph – December 2, 2015	Relevance; Prejudicial; Confusing; Misleading; Improper Character Evidence; Hearsay; Authentication FRE 401-404; 801 <i>et seq.</i> ; 901

Defendant reserves the right to amend these objections within the final Pretrial Report.

Respectfully submitted,

s/Stephen L. Gerles

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2017, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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***Attorneys for Defendant Charles Gadd***

s/ Stephen L. Geris  
\_\_\_\_\_  
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